

DRAFT

**Before the
Federal Communications Commission
Washington, DC 20554
In the Matter of:**

Comprehensive Review of Universal Service Fund Management, Administration and Oversight))))	WC Docket No. 05-195
Federal-State Joint Board of Universal Service))	CC Docket No. 96-45
Schools and Libraries Universal Service Support Mechanism)))	CC Docket No. 02-6
Rural Health Care Support Mechanism))	WC Docket No. 02-60
Lifeline and Link-Up))	C Docket No. 03-109
Changes to the Board of Directors for the National Exchange Carrier Association, Inc.))	C Docket No. 97-21

**REPLY COMMENTS OF THE
ILLINOIS STATE LIBRARY/OFFICE OF THE SECRETARY OF STATE
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING
AND
FURTHER NOTICE OF PROPOSED RULEMAKING**

The Illinois State Library, Office of the Secretary of State, strongly supports the recommendations of the American Library Association for streamlining the E-rate application process. The American Library Association comments were filed with the Federal Communications Commission on October 18, 2005.

The Illinois State Library is the official library for state government officials and employees and also works with the network of 4,000 public, school, academic and special libraries to expand and enhance library services statewide. We work with Illinois public libraries, library systems and other eligible library consortia with the E-rate process. However, many eligible public

libraries have not applied for E-rate funding because of the lengthy, convoluted application process that involves multiple forms.

According to the FY03 public library annual reports filed with the Illinois State Library, 143 Illinois public libraries (out of 645) did not apply for E-rate discounts because of the complex process. Finding time to submit an E-rate application (often including Forms 470, 471, 486 and 472 every single year) is extremely difficult in light of other priorities (with public service in the forefront of these priorities). In some instances, public libraries have applied for E-rate funds one year and decided it wasn't worth the hassle in the future. In other cases, they haven't tried to apply because of the intimidating application process.

Many rural Illinois public libraries are staffed by three or fewer full-time-equivalent employees. These staff members do not have time to complete the protracted application process in order to get universal service discounts on telecommunications services, Internet access and internal connections. A simpler application process to enable public libraries to benefit from the E-rate program is needed.

For libraries that apply for E-rate each year, the process is frustrating and protracted. The Putnam County Public Library District in Hennepin, Illinois provides the following example:

"I have been told that our E-rate application is a very complicated one. Not only do I deal with the four phone companies, 3 LATA boundaries, numerous bills, and shared services, but I also deal with shared services in two school districts. I can never get the reviewers to understand the differences in eligibility since they refer to the Putnam County Schools and insist that I agree to accepting that discount. One year I amended the application 13 times, just to get the original version [funded]. I happily endorse a less complicated E-rate application process.....

"Our budget is really tight – our six library branches eat up the telco \$ since we cross 3 LATA boundaries, utilize 4 service providers, and pay 14 bills.

-July 15, 2005 e-mail from Putnam County Public Library District
director, Randie Dellatori

Eva Kirk, director of the Cherry Valley Public Library District in northern Illinois describes the E-rate application process as “convoluted, complicated and frustrating.” She also stated that the E-rate application process is her least favorite task as library director. This refrain is heard again and again as public libraries try to address their burgeoning telecommunications costs but encounter extensive bureaucracy in their quest.

Joseph Sciacca from the Lincoln Trail Libraries System in Champaign, Illinois indicated that one library that is seriously considering dropping participation in the E-rate program estimated that the time required to complete the forms and manage the process took more than 200 hours per year.

Public libraries are often the only access point in a community to broadband Internet service for the general public. The E-rate program, which is supposed to make services more affordable for libraries and schools, needs to be comprehensible to the libraries that the program is intended to serve. The American Library Association’s in-depth comments on how to simplify the E-rate program while maintaining accountability are rational, valid and strongly supported.

Submitted by:

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